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January 24, 2024

VIA CM/ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Tagliabue v. NCM Bluegrass LLC et al.*, Case No.: 1:23-cv-01991-LDH-JRC

Dear Judge DeArcy Hall:

I write under Rule 1.4 of the Local Rules of this Court to respectfully request leave from the Court for me to withdraw as counsel of record for defendants NCM Bluegrass LLC and Anyar Gulyamov ("Defendants") because I am no longer with the firm Kane Kessler, P.C.

This action is at an early pleadings stage. Defendants filed their answer on January 9, 2024 [Dkt. No. 20] and counsel for the parties are scheduled to appear for the initial scheduling conference on February 1, 2024 [Dkt. No. 23].

The present motion for leave to withdraw as counsel is made with Defendants' consent. Moreover, the proposed withdrawal of counsel will not cause any undue delay or in any way prejudice Defendants in this matter because Kane Kessler, P.C. attorney S. Reid Kahn remains counsel of record and will continue representing Defendants in this litigation.

I am not asserting a retaining or charging lien upon any party.

Respectfully submitted,

/s/ Valerie K. Ferrier

Valerie K. Ferrier

Cc: Former Client (*via email*)